

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT L. CLARK JR.,

Defendant.

NO. 3:22-cv-05067-JCC

**CONSENT DECREE AND FINAL  
JUDGMENT**

Plaintiff, United States of America (“Plaintiff”), commenced the above-captioned action in this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Robert L. Clark Jr., is committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff’s allegations without litigation and jointly request and consent to the entry of this Consent Decree and Final Judgment (“Consent Decree”) without Defendant’s admission of liability or wrongdoing. Defendant agrees to waive service of the Summons and the Complaint.

Defendant has entered into this Consent Decree freely and without coercion. Defendant further acknowledges that he has read the provisions of this Consent Decree, understands them, and is prepared to abide by them.

**IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

1. This Court has jurisdiction over this matter and the parties pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under 28 U.S.C. § 1391(b) and (c).

2. Defendant neither admits nor denies the allegations in the Complaint. Only for purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

3. For purposes of this Consent Decree:

a. “Defendant” means Robert L. Clark Jr.

b. “Person” means an individual, a corporation, a partnership, or any other entity.

c. “Funds” include any currency, check, money order, stored value card, stored value card numbers, bank wire transmission, or other monetary value.

d. “Money transmitting business” refers to a person who, for a fee, receives funds from one person for the purpose of transmitting the funds, or providing access to the funds, to another person.

e. “Fee” refers to a payment or compensation of any kind regardless of how the payment or compensation is labeled, including but not limited to processing fees, service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and gratuities.

4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined from, directly or indirectly, assisting, facilitating, or participating in any money transmitting business.

1           5.       Within five (5) days after entry of this Consent Decree, the Defendant is ordered  
2 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent  
3 Decree sworn under penalty of perjury. The statement shall be addressed to:

4           U.S. Postal Inspector Amy Kerkof  
5           U.S. Postal Inspection Service  
6           P.O. Box 400  
            Seattle, WA 98111  
            206-442-6132 (desk)

7           6.       The Consent Decree shall not be modified except in writing by Plaintiff and the  
8 Defendant and approved by the Court.

9           7.       This Consent Decree shall constitute a final judgment and order in this action.


10          8.       This Court retains jurisdiction of this action for the purpose of enforcing or  
11 modifying this Consent Decree and for the purpose of granting such additional relief as may be  
12 necessary or appropriate.

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**APPROVED AND ENTERED BY THIS COURT**

DATED this 2nd day of February, 2022.

  
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JOHN C. COUGHENOUR  
United States District Judge

We hereby consent to the entry of the foregoing Decree:

**FOR DEFENDANT ROBERT L. CLARK JR.**

Dated: January 19, 2022

  
\_\_\_\_\_  
ROBERT CLARK  
Robert L. Clark Jr.

**FOR PLAINTIFF THE UNITED STATES OF AMERICA**

NICHOLAS W. BROWN  
United States Attorney

Dated: February 1, 2022

By: s/ Nickolas Bohl  
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